UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: DANIEL ROSS BOYER, SR. and : CHAPTER 13

KATHLEEN TERESA BOYER

Debtors

JACK N. ZAHAROPOULOS

STANDING CHAPTER 13 TRUSTEE

Movant

VS.

DANIEL ROSS BOYER, SR. and

KATHLEEN TERESA BOYER

Respondents : CASE NO. 1-18-bk-04751

TRUSTEE'S OBJECTION TO THIRD AMENDED CHAPTER 13 PLAN

AND NOW, this 17th day of January, 2023, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

- 1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
 - a. Insufficient Monthly Net Income as indicated on Schedules I and J.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036

(717) 566-6097

BY: /s/Douglas R. Roeder

Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 17th day of January, 2023, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Lisa Rynard, Esquire 240 Broad Street Montoursville, PA 17754

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee